



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS TX 75202-2733

April 18, 2012

CERTIFIED MAIL 7011 0110 0001 3590 2348 RETURN RECEIPT REQUESTED

Ms. Shelly Williamson  
Environmental Manager  
Diamond Shamrock Refining Company, LP  
Valero McKee Refinery  
6701 FM 119  
Sunray, Texas 79086

RE: Diamond Shamrock Refining Company, LP (Diamond Shamrock) Final Petition Reissuance  
Decision for WDW-102, WDW-192 and WDW-332

Dear Ms. Williamson:

Effective the date of this letter, the Environmental Protection Agency (EPA) approves the reissuance request for an exemption to the land disposal restrictions for the WDW-102, WDW-192 and WDW-332 injection wells at the Diamond Shamrock Valero McKee Refinery in Sunray, Texas.

The land disposal restrictions prohibit the injection of hazardous waste unless a petitioner can demonstrate to EPA, to a reasonable degree of certainty, that there will be no migration of hazardous constituents from the injection zone for as long as the wastes remain hazardous. The land disposal restrictions for injection wells codified in 40 CFR Part 148, provide the standards and procedures by which petitions to dispose of an otherwise prohibited waste by injection will be reviewed and by which exemptions pursuant to these petitions will be granted or denied.

A letter dated February 22, 2012, informed Diamond Shamrock that EPA was proposing to approve a petition reissuance request for an exemption to the land disposal restrictions. The public comment period associated with this decision began on February 27, 2012, and closed on April 12, 2012. No comments were received.

Based on a detailed technical review of the submitted petition reissuance request and support documents, EPA has determined that this information for the Diamond Shamrock facility meets the requirements of 40 CFR Part 148 by demonstrating no migration of hazardous constituents from the injection zone for 10,000 years.

The following are conditions of this land disposal restrictions exemption:

Petition Reissuance Approval Conditions

This petition reissuance of exemption approval to allow the continued injection of restricted hazardous wastes is subject to the following conditions, which are necessary to assure that the standard in 40 CFR §148.20(a) is met. Noncompliance with any of these conditions is grounds for termination of the exemption in accordance with 40 CFR §148.24(a)(1). This exemption reissuance is applicable to the



Diamond Shamrock injection wells, WDW-102, WDW-192, and WDW-332, located at the Valero McKee Refinery in Sunray, Texas.

1. Injection of restricted waste shall be limited to the following injection zone:

<u>Well</u>	<u>Depth of Injection Zone</u>
WDW-102	3700' - 5937' KB
WDW-192	3684' - 5932' KB
WDW-332	3710' - 5866' KB

(WDW-102 depths referenced to 1/22/71 Dual Induction - Laterolog using Kelly Bushing (KB) depths in feet; WDW-192 depths referenced to 3/25/82 Dual Induction - SFL With Linear Correlation Log using KB depths in feet; and WDW-332 depths referenced to 1/15/11 Array Compensated True Resistivity Log using KB depths in feet).

The injection interval shall be defined by the following correlative log depths:

<u>Well</u>	<u>Injection Interval</u>	<u>Depth of Injection Interval</u>
WDW-102	Granite Wash	4650' - 5075' KB
WDW-192	Granite Wash	4670' - 5098' KB
WDW-332	Granite Wash	4604' - 5075' KB

(WDW-102 depths referenced to 1/22/71 Dual Induction - Laterolog using Kelly Bushing (KB) depths in feet; WDW-192 depths referenced to 3/25/82 Dual Induction - SFL With Linear Correlation Log using KB depths in feet; and WDW-332 depths referenced to 1/15/11 Array Compensated True Resistivity Log using KB depths in feet).

2. For WDW-102, WDW-192, and WDW-332 combined, the cumulative volume injected on a monthly basis shall not exceed that calculated by multiplying 1500 gpm X 1440 minutes/day X the number of days in that month. The cumulative volume injected into an individual well shall not exceed that calculated by multiplying 1000 gpm X 1440 minutes/day X the number of days in that month.
3. The facility shall cease injection into WDW-102, WDW-192, and WDW-332 by December 31, 2025.
4. The characteristics of the injected waste stream shall for WDW-102, WDW-192, and WDW-332 at all times conform to those discussed in Section 6 and Table 6-3 of the Petition Reissuance document for WDW-102, WDW-192, and WDW-332. The specific gravity of the waste stream for WDW-102, WDW-192, and WDW-332 shall remain within a range from 1.00 to 1.20 as measured at 60°F and 1 atmosphere with a reference temperature of 60 °F.
5. The approval for injection is limited to the following hazardous wastes:

D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D023, D024, D025, D026, D035

F003, F004, F005, F037, F038, F039 (for constituents listed in Table 6-3 in Section 6 of the Reissuance Document)

K048, K049, K050, K051, K052

U019, U052, U055, U056, U101, U151, U154, U159, U165, U188, U220, U239



6. The facility must petition for approval to inject additional hazardous wastes which are not included in Condition No. 5, above. The facility must also petition for approval to increase the concentration of any waste which would necessitate the recalculation of the limiting concentration reduction factor and the extent of the waste plume. Petition reissuances and modifications should be made pursuant to §148.20 (e) or (f).

7. For WDW-102, WDW-192 or WDW-332, upon recompletion into the upper, currently unperforated portion of the Injection Interval, the following must be done:

A flow profile survey, acceptable to the Agency shall be run. If the flow rate into the existing perforations becomes less than that currently modeled, the transmissivity and porosity employed in the modeling demonstration must be re-evaluated. This must be done prior to the re-establishment of injection of the wastes covered by this petition approval into the affected well, and re-demonstrated on an annual basis.

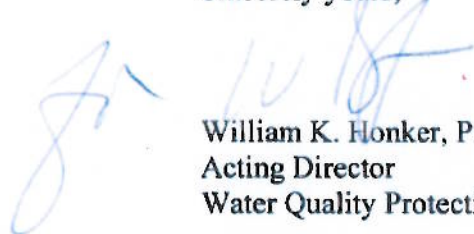
8. Diamond Shamrock shall annually submit to EPA the results of a bottomhole pressure survey each for WDW-102, WDW-192, and WDW-332. These surveys shall be performed after shutting in each well for a period of time sufficient to allow the pressure in the injection interval to reach equilibrium, in accordance with §146.68(e)(1). The annual report should include a comparison of reservoir parameters determined from the falloff test with parameters used in the approved no migration petition.

9. Upon the expiration, cancellation, reissuance, or modifications of the Texas Commission on Environmental Quality's Underground Injection Control permit for Well Nos. WDW-102, WDW-192, or WDW-332, this exemption is subject to review. A new demonstration may be required if information shows that the basis for granting the exemption is no longer valid under 40 CFR §148.23 and §148.24.

In addition to the above conditions, this petition reissuance for exemption approval is contingent on the validity of the information submitted in the Diamond Shamrock reissuance request for an exemption to the land disposal restrictions. This final reissuance decision is subject to termination when any of the conditions occur which are listed in 40 CFR §148.24, including noncompliance, misrepresentation of relevant facts, or a determination that new information shows that the basis for approval is no longer valid.

If you have any questions or comments, please call Phil Dellinger at (214) 665-7150.

Sincerely yours,



William K. Honker, P.E.  
Acting Director  
Water Quality Protection Division

